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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,) No. CR 07-0803-MMC
18 Plaintiff,)
19 v.) GOVERNMENT'S EXHIBIT B TO
20 LAWRENCE E. CRAYTON III,) GOVERNMENT'S OPPOSITION TO
21 Defendant.) DEFENDANT'S SENTENCING
22) MEMORANDUM

23 On July 25, 2008, the government filed its opposition to defendant's sentencing
24 memorandum. Attached as Exhibit A to the government's opposition was a spreadsheet which
25 responded to individual objections made by the defendant. That spreadsheet was grouped and
26 organized by objection categories. For the Court's convenience, the government hereby submits
27 //
28 //

GOVT'S EXH. B TO GOVT'S OPPO TO DEFT'S SENT. MEM.
CR 07-0803-MMC

1 Exhibit B, the same response spreadsheet, but organized chronologically by date and ticket
2 number.

3 DATED: July 29, 2008

Respectfully submitted,

4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 /s/
7 CHRISTINA HUA
8 Assistant United States Attorney

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EXHIBIT B

Year 1999

Line #	YR	Exhibit #	Name	Alleged Problem	Bates #	Amount	Response
1	1999	1	Broward	Appears to be good	CRA0031	\$500	Govt Agrees/Different Hand Writing
2	1999	1	Smith	Appears to be good	CRA0031	\$200	Govt. Agrees
3	1999	2	Montesa	Ambiguous Number	CRA035	\$200	Legible Copy Available
5	1999	4	Walsh, J.D	Ambiguous Number	CRA0043	\$350	Legible Copy Available
6	1999	5	Walsh, Bob	Appears to be good	CRA0047	\$100	Govt. Agrees
7	1999	6	Smith, John	Appears to be good	CRA0051	\$200	Govt. Agrees
10	1999	8	Mussen	Appears to be good	CRA0059	\$200	Govt. Agrees
16	1999	13	Oleske	Appears to be good	CRA0081	\$250	Govt. Agrees
17	1999	14	Quintanilla	Illegible Ticket No	CRA0085	\$170	Legible copy submitted 7/23/08
						\$2,170	

Year 2000

24	2000	20A	Unknown	Report Only	CRA00103/104	\$200	Govt Disagrees; see Sent Mem
29	2000	25	Carrie, B.	Illegible Ticket No	CRA00123	\$250	Legible copy submitted 7/23/08
45	2000	38	Sherer	Other Agent signed	CRA00173/174	\$100	Govt Agrees
50	2000	43	Unknown	Report Only	CRA00190/193	\$100	Govt Disagrees; see Sent Mem
51	2000	43	Unknown	Report Only	CRA00190/193	\$100	Govt Disagrees; see Sent Mem
52	2000	43	Unknown	Report Only	CRA00190/193	\$390	Govt Disagrees; see Sent Mem
57	2000	48	Unknown	Report Only	CRA00209/210	\$500	Govt Disagrees; see Sent Mem
58	2000	49	Woodard	Illegible Ticket No	CRA00213	\$400	Legible copy submitted 7/23/08
66	2000	56	Unknown	Report Only	CRA00239/240	\$300	Govt Disagrees; see Sent Mem
67	2000	56	Unknown	Report Only	CRA00239/240	\$300	Govt Disagrees; see Sent Mem
71	2000	59	Brunot	Other Agent signed	CRA00251/252	\$500	Govt Agrees
72	2000	60	Unknown	Report Only	CRA00253/254	\$100	Govt Disagrees; see Sent Mem
73	2000	61	Unknown	Report Only	CRA00255/256	\$500	Govt Disagrees; see Sent Mem
74	2000	62	Unknown	Report Only	CRA00257/258	\$300	Govt Disagrees; see Sent Mem
75	2000	63	Unknown	Report Only	CRA00259/260	\$200	Govt Disagrees; see Sent Mem
76	2000	63	Unknown	Report Only	CRA00259/260	\$500	Govt Disagrees; see Sent Mem
77	2000	64	Unknown	Report Only	CRA00261/262	\$400	Govt Disagrees; see Sent Mem
78	2000	64	Unknown	Report Only	CRA00261/262	\$350	Govt Disagrees; see Sent Mem
88	2000	72	Williams	No Voucher/Report	CRA00281/282	\$212	Submitted 7/23/08
89	2000	73	Iozou	No Voucher/Report	CRA00283/284	\$400	Submitted 7/23/08
90	2000	73	King	No Voucher/Report	CRA00283/284	\$200	Submitted 7/23/08
91	2000	74	Jamison	Illegible Ticket No	CRA00287/288	\$385	Submitted 7/23/08
94	2000	76	Unknown	Report Only	CRA00293/294	\$75	Govt Disagrees; see Sent Mem

Line #	YR	Exhibit #	Name	Alleged Problem	Bates #	Amount	Response
95	2000	76	Cuaiell	No Voucher/Report	CRA293/294	\$225	Submitted 7/23/08
100	2000	80	Cortes	No Voucher/Report	CRA00303/304	\$100	Submitted 7/23/08
102	2000	82	Beatty	Other Agent signed	CRA00311/312	\$200	Govt Agrees
						<u>\$7,287</u>	

Year 2001

108	2001	86	Unknown	Report Only	CRA00341/324/325	\$500	Govt Disagrees; see Sent Mem
109	2001	86	Unknown	Report Only	CRA00341/324/325	\$200	Govt Disagrees; see Sent Mem
114	2001	88	Williams	Illegible Ticket No	CRA00332	\$1,000	Submitted 7/23/08
115	2001	89	None	Report Only	CRA00334	\$100	Govt Disagrees; see Sent Mem
116	2001	89	None	Report Only	No Bates	\$100	Govt Disagrees; see Sent Mem
120	2001	93	Unknown	Report Only	CRA0034600347	\$100	Govt Disagrees; see Sent Mem
121	2001	93	Unknown	Report Only	CRA00346/347	\$100	Govt Disagrees; see Sent Mem
122	2001	95	Unknown	Report Only	CRA00350/351	\$500	Govt Disagrees; see Sent Mem
123	2001	96	Gipson	Illegible Ticket No	CRA00354	\$500	Submitted 7/23/08
125	2001	98	Unknown	Report Only	CRA00360/361	\$134	Govt Disagrees; see Sent Mem
127	2001	None	Unknown	Report Only	CRA00632	\$100	Govt Disagrees; see Sent Mem
131	2001	102	None	Report Only	CRA00372/373	\$300	Govt Disagrees; see Sent Mem
135	2001	106	Littman	Wrong Voucher Amount	CRA00387/388	<u>\$100</u>	Deft Mistaken
139	2001	109	Beagan	Illegible Ticket No	CRA00401	\$400	Legible Copy Available
140	2001	110	Unknown	Report Only	CRA00403	\$200	Govt Disagrees; see Sent Mem
141	2001	110	Unknown	Report Only	CRA00403	\$250	Govt Disagrees; see Sent Mem
148	2001	115	None	Report Only	CRA00421/00423	\$200	Govt Disagrees; see Sent Mem
149	2001	115	None	Report Only	CRA00421/00423	\$196	Govt Disagrees; see Sent Mem
152	2001	117	Unknown	Report Only	CRA00428/429	\$292	Govt Agrees- Other Station Agent
153	2001	117	Unknown	Report Only	CRA00428/429	\$152	Govt Agrees- Other Station Agent
156	2001	119	Unknown	Report Only	CRA00434/435	\$200	Govt Disagrees; see Sent Mem
157	2001	129	Unknown	Report Only	CRA00436/438	\$575	Govt Disagrees; see Sent Mem
158	2001	121	Barnes	Illegible Ticket No	CRA00442	\$304	Legible Copy Available
161	2001	None	Martinez	No Voucher/Report	CRA0451/00452	\$500	Submitted 7/23/08
162	2001	None	None	Report Only	CRA0000451/452	\$300	Govt Disagrees; see Sent Mem
164	2001	124	Unknown	Report Only	CRA00453	\$140	Govt Disagrees; see Sent Mem
165	2001	124	Unknown	Report Only	CRA00453	\$500	Govt Disagrees; see Sent Mem
168	2001	127	Unknown	Report Only	CRA00462/463	\$150	Govt Agrees- Other Station Agent
169	2001	127	Unknown	Report Only	CRA00462/463	\$331	Govt Agrees- Other Station Agent
170	2001	128	Unknown	Report Only	CRA00464/465	\$194	Govt Disagrees; see Sent Mem

Line #	YR	Exhibit #	Name	Alleged Problem	Bates #	Amount	Response
171	2001	130	Unknown	Report Only	CRA00468/469	\$159.60	Govt Disagrees; see Sent Mem
172	2001	129	Unknown	Report Only	CRA00468/469	\$159	Govt Disagrees; see Sent Mem
174	2001	131	Unknown	Report Only	CRA00470/471	\$142	Govt Disagrees; see Sent Mem
175	2001	131	Unknown	Report Only	CRA00470/471	\$154.70	Govt Disagrees; see Sent Mem
178	2001	None	Wung	No Voucher/Report	No Bates	\$700	Submitted 7/23/08
179	2001	None	Adleg	No Voucher/Report	No Bates	\$200	Submitted 7/23/08
180	2001	None	Jenkins	No Voucher/Report	No Bates	\$400	Submitted 7/23/08
						<u>\$10,533</u>	

Year 2002

183	2002	135	None	Report Only	CRA00486/487	\$200	Govt Disagrees; see Sent Mem
184	2002	135	None	Report Only	CRA00486/487	\$390	Govt Disagrees; see Sent Mem
186	2002	136	None	Report Only	CRA00488/489	\$100	Govt Disagrees; see Sent Mem
187	2002	136	None	Report Only	CRA00488/489	\$514	Govt Disagrees; see Sent Mem
188	2002	137	None	Report Only	CRA00490/491	\$696	Govt Disagrees; see Sent Mem
189	2002	137	None	Report Only	CRA00490/491	\$237	Govt Disagrees; see Sent Mem
193	2002	140	None	Report Only	CRA00500/501	\$150	Govt Disagrees; see Sent Mem
194	2002	140	None	Report Only	CRA00500/501	\$470	Govt Disagrees; see Sent Mem
195	2002	140	None	Report Only	CRA00500/501	\$75	Govt Disagrees; see Sent Mem
196	2002	141	None	Report Only	CRA00502/503	\$202	Govt Disagrees; see Sent Mem
197	2002	142	N	Report Only	CRA00504/505	\$248	Govt Disagrees; see Sent Mem
198	2002	143	N	Report Only	CRA00506/507	\$350	Govt Disagrees; see Sent Mem
199	2002	144	N	Report Only	CRA00508	\$145.50	Govt Disagrees; see Sent Mem
201	2002	145	Unknown	Report Only	CRA00512/513	\$213	Govt Disagrees; see Sent Mem
205	2002	148	Unknown	Report Only	CRA00524/525	\$888	Govt Disagrees; see Sent Mem
206	2002	149	Unknown	Report Only	CRA00526/527	\$500	Govt Disagrees; see Sent Mem
207	2002	150	Unknown	Report Only	CRA00528/529	\$150	Govt Disagrees; see Sent Mem
208	2002	150	Unknown	Report Only	CRA00528/529	\$554	Govt Disagrees; see Sent Mem
209	2002	150	Unknown	Report Only	CRA00528/529	\$72	Govt Disagrees; see Sent Mem
210	2002	151	Unknown	Report Only	CRA00530/531	\$300	Govt Disagrees; see Sent Mem
213	2002	156	Unknown	Report Only	CRA00544/545	\$90	Govt Disagrees; see Sent Mem
214	2002	156	Unknown	Report Only	CRA00544/545	\$150	Govt Disagrees; see Sent Mem
215	2002	156	Unknown	Report Only	CRA00544/545	\$85	Govt Disagrees; see Sent Mem
216	2002	157	Ingleman	Voucher not on Sales Rpt	CRA00546/548	\$300	Deft Mistaken
217	2002	157	Unknown	Report Only	CRA00546/547	\$146	Govt Disagrees; see Sent Mem
218	2002	157	None	Report Only	CRA00546/547	\$150	Govt Disagrees; see Sent Mem

Line #	YR	Exhibit #	Name	Alleged Problem	Bates #	Amount	Response
219	2002	157	None	Report Only	CRA00546/547	\$140	Govt Disagrees; see Sent Mem
225	2002	163	Unknown	Report Only	CRA00566/567	\$99	Govt Disagrees; see Sent Mem
226	2002	163	Unknown	Report Only	CRA00566/567	\$100	Govt Disagrees; see Sent Mem
231	2002	168	Unknown	Report Only	CRA00584/585	\$146	Govt Disagrees; see Sent Mem
233	2002	169	Unknown	Report Only	CRA00587/1571	\$1,450	Govt Disagrees; see Sent Mem
234	2002	169	Unknown	Report Only	CRA00586587	\$1,450	Govt Disagrees; see Sent Mem
236	2002	170	Unknown	Report Only	CRA00589/590	\$100	Govt Disagrees; see Sent Mem
237	2002	170	Unknown	Report Only	CRA00591	\$800	Govt Disagrees; see Sent Mem
238	2002	170	Unknown	Report Only	CRA00591	\$54	Govt Disagrees; see Sent Mem
241	2002	172	None	Report Only	CRA00595/596	\$85	Govt Disagrees; see Sent Mem
244	2002	174	Unknown	Report Only	CRA00603/604	\$532	Govt Disagrees; see Sent Mem
247	2002	176	Unknown	Report Only	CRA00611/612	\$408	Govt Disagrees; see Sent Mem
248	2002	177	Unknown	Report Only	CRA00615/616	\$300	Govt Disagrees; see Sent Mem
253	2002	181	Nicholas, G	Illegible Ticket No	CRA00631	\$300	Legible Copy Available
254	2002	181	Unknown	Report Only	CRA00629/630	\$100	Govt Disagrees; see Sent Mem
259	2002	185	Unknown	Report Only	CRA00645/646	\$300	Govt Disagrees; see Sent Mem
260	2002	186	Cromwell	Illegible Ticket No	CRA00649	\$550	Legible Copy Available
261	2002	186	None	Report Only	CRA00647/648	\$70	Govt Disagrees; see Sent Mem
262	2002	186	None	Report Only	CRA00647/648	\$200	Govt Disagrees; see Sent Mem
264	2002	187	None	Report Only	CRA00651/652	\$400	Govt Disagrees; see Sent Mem
266	2002	188	None	Report Only	CRA00655/656	\$150	Govt Disagrees; see Sent Mem
273	2002	193	None	Report Only	CRA00675/676	\$300	Govt Disagrees; see Sent Mem
275	2002	194	None	Report Only	CRA00679/680	\$200	Govt Disagrees; see Sent Mem
289	2002	204	None	Report Only	CRA00719/720	\$200	Govt Disagrees; see Sent Mem
290	2002	Pacheco		Illegible Ticket No		\$500	Legible Copy Available
294	2002	206	None	Report Only	CRA00725/726	\$398	Govt Disagrees; see Sent Mem
295	2002	207	None	Report Only	CRA00725/726	\$250	Govt Disagrees; see Sent Mem
297	2002	208	None	Report Only	CRA00732/733	\$64	Govt Disagrees; see Sent Mem
303	2002	211	Vu	Illegible Ticket No	CRA00746	\$100	Legible Copy Available
310	2002	216	Henshaw	Other Agent Signed	CRA00765/766	\$274	Govt Agrees
313	2002	216	None	Report Only	CRA00764/765	\$745	Govt Disagrees; see Sent Mem
319	2002	220	None	Report Only	CRA00780/781	\$254	Govt Disagrees; see Sent Mem
330	2002	227	None	Report Only	CRA00805/806	\$250	Govt Disagrees; see Sent Mem
331	2002	228	None	Report Only	CRA00809/810	\$577	Govt Disagrees; see Sent Mem
332	2002	228	None	Report Only	CRA00809/810	\$400	Govt Disagrees; see Sent Mem
340	2002	234	None	Report Only	CRA00831/832	\$369	Govt Disagrees; see Sent Mem

Line #	YR	Exhibit #	Name	Alleged Problem	Bates #	Amount	Response
344	2002	236	Jacobsen	No Ticket no	CRA00841	\$400	Crayton Responsible For Input
356	2002	244	None	Report Only	CRA00870/871	\$400	Govt Disagrees; see Sent Mem
364	2002	249	None	Report Only	CRA00889/890	\$338	Govt Disagrees; see Sent Mem
375	2002	256	None	Report Only	CRA00917/918	\$200	Govt Disagrees; see Sent Mem
378	2002	258	Langley	No Ticket no	CRA00258	\$200	Crayton Responsible For Input
385	2002	264	Lam	No Voucher/Report	CRA00949/952	<u>\$475</u>	Govt Agrees
						<u><u>\$22,004</u></u>	
Year 2003							
429	2003	294	Kwan	No Ticket No	CRA0001069	\$500	Crayton Responsible For Input
433	2003	297	None	Report Only	CRA01079/01080	\$300	Govt Disagrees; see Sent Mem
457	2003	None	Langley	No Voucher/Report	None	\$200	Submitted 7/23/08
461	2003	309	Castro	Other Agent Signed	CRA01131	\$175	Govt Agrees
520	2003	347	I.Chu	No Voucher/Report	CRA01264/01268	\$300	Submitted 7/23/08
521	2003	347	Hu, Sing	No Voucher/Report	CRA01264/01268	<u>\$594</u>	Submitted 7/23/08
						<u><u>\$2,069</u></u>	
Year 2004							
605	2004	None	Ming/Chu	No Voucher/Report	None	\$374	Submitted 7/23/08
606	2004	None	Wong/Pet	No Voucher/Report	None	<u>\$1,067</u>	Submitted 7/23/08
						<u><u>\$1,441</u></u>	
					Grand Total	<u><u>\$45,504</u></u>	